

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GREENTREE FINANCIAL GROUP, INC.,

Plaintiff,

-against-

CHIJET MOTOR COMPANY, INC., AND
EQUINITI TRUST COMPANY, LLC, F/K/A
AMERICAN STOCK TRANSFER & TRUST
COMPANY, LLC,

Defendants.

Case No. 1:24-cv-06415-VEC

CHIJET MOTOR COMPANY, INC.

Counterclaim Plaintiff,

-against-

GREENTREE FINANCIAL GROUP, INC. and
WEIHENG CAI, an Individual,

Counterclaim Defendants.

**MOTION TO TEMPORARILY STAY PROCEEDINGS AND FOR
LEAVE TO WITHDRAW AS COUNSEL**

Pursuant to Local Civil Rule 1.4, Cooley LLP, Counsel for Defendants Chijet Motor Company, Inc. (“Chijet”) and Equiniti Trust Company, LLC, f/k/a American Stock Transfer & Trust Company LLC (“Equiniti,” and with Chijet, “Defendants”), and the individual attorneys from Cooley LLP who have appeared herein (collectively, “Cooley”), hereby move for leave to withdraw as counsel and for a temporary stay of proceedings pending Defendants’ engagement of new legal representation.

As set forth in the accompanying Declaration of Aric H. Wu, dated March 24, 2025, Defendants have terminated their engagement of Cooley for this matter and instructed Cooley to cease any further work in the matter aside from this motion. *See* Wu Decl. ¶ 3. Per Rule 1.16(b)(3)

of the New York Rules of Professional Conduct, “a lawyer shall withdraw from the representation of a client when . . . [t]he lawyer is discharged.” N.Y. Comp. Codes R. & Regs. tit. 22 § 1200.1.16(b)(3); *see also In re Weiner*, 2019 WL 2575012, at *4 (Bankr. S.D.N.Y. June 21, 2019) (“It is undisputed that the Debtor terminated the services of the Firm and that the Firm accepted that discharge. . . . The Court cannot and will not compel the Firm to represent the Debtor.”).

To afford Chijet and Equiniti adequate time to secure new legal representation, Cooley requests that the action be temporarily stayed for at least thirty (30) days. The current deadlines in the action are as follows: (i) March 27, 2025: Chijet’s opposition to Plaintiff’s motion to dismiss Chijet’s counterclaims; Chijet’s opposition to Plaintiff’s motion for leave to file a second amended complaint; and Equiniti’s reply in further support of its motion to dismiss Plaintiff’s claims against it; (ii) March 28, 2025: exchange of initial requests for production of documents; (iii) December 31, 2025: Completion of fact discovery; and (iv) March 31, 2026: completion of expert discovery. ECF No. 44. The next pretrial conference in the action is scheduled for January 9, 2026. *Id.*

This motion is being made at Defendants’ request and with Defendants’ consent. For all the reasons herein, Cooley and Defendants respectfully request that the Court:

- a. grant Cooley leave to withdraw as counsel for Chijet and Equiniti;
- b. temporarily stay the action and all pending deadlines in the action by at least thirty (30) days to afford Chijet and Equiniti adequate time to secure new legal representation; and
- c. grant such other and further relief as this Court deems just and proper.

Dated: New York, New York
March 24, 2025

Respectfully submitted,

COOLEY LLP

By: /s/ Aric H. Wu
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